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May 16, 2013

Honorable Gary Brown
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Rothschild-Kaplan v. County of Nassau
Docket No. CV-11-3853 (MKB)(GRB)

Dear Judge Brown:

As you are aware, this firm represents the Plaintiff, Abby Rothschild-Kaplan in the above referenced matter. We write to respectfully request an extension of time to complete discovery in this matter. As per your Honor's Order dated March 19, 2013, discovery is to be completed by June 19, 2013. The parties request an additional sixty (60) days as new parties have been added. This application is being made with the consent of Pablo Fernandez, Esq. This is the Parties' second request for an extension of time.

As per my previous letter to the Court, Defendant's Timothy Dilea and Joseph Lobello have been added as Defendants in this matter. The Defendants have been served and each has filed an answer with the Court on April 30, 2013. The Parties have not yet exchanged paper discovery as to these two Defendants. As such, we request and extension of time to exchange same and to conduct depositions.

In addition, Ms. Rothschild-Kaplan was deposed by Mr. Fernandez on April 16, 2013. Mr. Fernandez made additional demands during Ms. Rothschild-Kaplan's deposition, but has been unable to put them in writing, as he has not yet received a copy of the transcript. Also, the Deposition of Police Officer Curtain has not yet taken place as I was engaged on a six-week trial in Hempstead District Court in the matter of *People v. Derrick Patten*, Docket No.:2011NA010349.

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As such, the Parties respectfully request until August 19, 2013 to complete discovery in this matter. If the Court is inclined to grant such request, the Parties also request that the remaining deadlines are extended as well in light of same. We thank the Court for its kind consideration.

Respectfully Submitted,

/s/
JOHANNA C. DAVID

;jcd

cc: Pablo Fernandez, Esq. (Via ECF)